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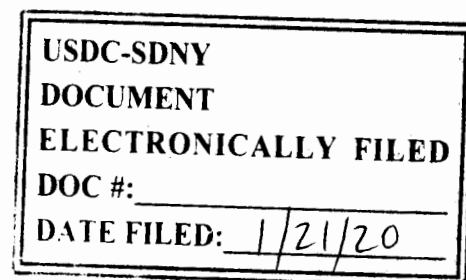
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*REPLY TO NEW YORK OFFICE

January 17, 2020

VIA ECF

Honorable Judge Ronnie Abrams
US District Court-Southern District
40 Foley Square- Courtroom 1506
New York, New York 10007



Re: Haydee Cifuentes v. Target Corporation
Docket No.: 19-cv-6805
Our File No.: TARG-548

Dear Honorable Judge Abrams:

Our office represents the Defendant, Target Corporation in connection with the above-mentioned matter. This correspondence is respectfully submitted for a request for an extension of time for discovery and adjournment of the Post Discovery Conference scheduled on January 24, 2020. This request is done on consent from plaintiff's counsel and this is our second request for an extension.

The initial request was to revise the Case Management Order because of the expiration of time while the plaintiff's reevaluated his motion for remand and discontinuation of the action against Kingsbridge.

Pursuant to the revised Case Management Order (filed on September 5, 2019), all parties were to exchange Rule 26 Disclosures by September 27, 2019 and initial requests for production of documents on this date. Defendants served their Rule 26 Disclosure on September 25, 2019 along with demands for production of documents and interrogatories on this same date. Plaintiff's counsel e-filed their Rule 26 Disclosure without authorizations via ECF on October 7, 2019. The undersigned's office received the authorizations on October 10, 2019.

The authorizations were timely processed however, we still don't have complete medical records. Plaintiff's counsel did not respond to the discovery demand until November 27, 2019. As such, plaintiff's deposition was scheduled for January 14, 2020.

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On January 14, 2020, due to a scheduling conflict and an additional request for documents, (served on December 24, 2019) the parties discussed a new date for plaintiff's deposition, however, due to the availability of the plaintiff and the undersigned we were not able to schedule a date before February 10, 2020.

Since, as per the order fact discovery is to be completed by January 17, 2020 and depositions to be completed by February 10, 2020, we are requesting an extension of time to complete fact discovery to March 30, 2020.

Further, due to a pre-planned business trip, the undersigned is not available for the Post Discovery Conference scheduled on January 24, 2020. I respectfully request an adjournment of this conference so that the parties can complete the discovery.

Respectfully submitted,

MOLOD SPITZ & DeSANTIS, P.C.

By: Alice Spitz
Alice Spitz

AS/td

CC:

Joshua Gropper

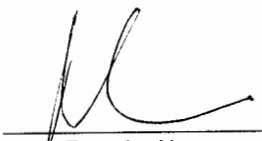
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Application granted. The parties shall complete fact discovery by March 30, 2020. The post-discovery conference scheduled for January 24, 2020 is hereby adjourned to April 10, 2020 at 11:00 a.m.

SO ORDERED.


Hon. Ronnie Abrams
1/21/2020